

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:	§	Chapter 11
	§	
23ANDMEHOLDING CO., <i>et al.</i> ,	§	Case No. 25-40976
Debtors.	§	
	§	(Jointly Administrated)
	§	
The State of Arizona, ex rel. Kristin K. Mayes,	§	
the Attorney General; Office of the Attorney	§	Hon. Brian C. Walsh
General, State of Colorado; State of	§	U.S. Bankruptcy Judge
Connecticut; District of Columbia, Office of the	§	
Attorney General; State of Florida, Office of the	§	
Attorney General, Department of Legal Affairs;	§	Response Deadline: April 29, 2025
Office of the Illinois Attorney General; The	§	Hearing Date: April 29, 2025
Commonwealth of Kentucky, ex rel. Russell	§	Hearing Time: 1:30 p.m. (CST)
Coleman, Attorney General; State of Louisiana;	§	Hearing Location:
State of Maine; Michigan Attorney General, <i>ex</i>	§	Thomas F. Eagleton U.S. Courthouse
<i>rel.</i> the People of the State of Michigan; State	§	111 S. 10 th Street
of Minnesota, by its Attorney General, Keith	§	Courtroom 5 North
Ellison; New Hampshire Office of the Attorney	§	St. Louis, MO 63102
General, Consumer Protection Division; New	§	
Mexico Department of Justice; New York State	§	
Attorney General's Office; State of North	§	
Carolina; Ohio Attorney General; The State of	§	
Oregon, by and through its Attorney General	§	
Dan Rayfield; The State of South Carolina ex	§	
rel. Alan Wilson, in his official capacity as	§	
Attorney General of the State of South Carolina;	§	
State of Utah, Office of the Utah Attorney	§	
General; State of Vermont; Commonwealth of	§	
Virginia, <i>ex rel.</i> Jason S. Miyares, Attorney	§	
General; Washington Attorney General Nick	§	
Brown; Office of the West Virginia Attorney	§	
General; State of Wisconsin	§	
	§	
Movants,	§	
	§	
v.	§	
	§	
23ANDME HOLDING CO., <i>et al.</i> , ¹	§	
Respondents.	§	

¹ A complete list of Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/23andMe>. The Debtors' service address for purposes of these chapter 11 cases is: 870 Market Street, Room 415, San Francisco, CA 94102.

**SUPPLEMENT TO THE STATES' MOTION FOR THE APPOINTMENT OF A
CONSUMER PRIVACY OMBUDSMAN AND A SECURITY EXAMINER
PURSUANT TO 11 U.S.C. SECTIONS 105(a), 332, 363(b)(1) AND FEDERAL RULE
OF BANKRUPTCY PROCEDURE 6004(G) AND NOTICE OF HEARING**

WARNING: THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE BY APRIL 29, 2025. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE DATE IS SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

COMES NOW, The State of Arizona, ex rel. Kristin K. Mayes, the Attorney General; Office of the Attorney General, State of Connecticut; District of Columbia, Office of the Attorney General; State of Florida, Office of the Attorney General, Department of Legal Affairs; Office of the Illinois Attorney General; State of Louisiana; State of Maine; Michigan Attorney General, *ex rel.* the People of the State of Michigan; New Hampshire Office of the Attorney General, Consumer Protection Division; New Mexico Department of Justice; New York State Attorney General's Office; State of North Carolina; Ohio Attorney General; The State of South Carolina *ex rel.* Alan Wilson, in his official capacity as Attorney General of the State of South Carolina; State of Utah, Office of the Utah Attorney General; State of Vermont; Commonwealth of Virginia, *ex rel.* Jason S. Miyares, Attorney General; Washington Attorney General Nick Brown; Office of the West Virginia Attorney General; State of Wisconsin² by and through

² Hereinafter, the "States" or "NAAG Client States" and together with the State of Colorado, Commonwealth of

Abigail R. Ryan, Bankruptcy Counsel, National Association of Attorneys General, and by the State of Colorado, by and through Senior Assistant Attorney General, Robert Padjen; by The Commonwealth of Kentucky, ex rel. Russell Coleman, Attorney General, by and through Assistant Attorney General, Christopher D. Hunt; by the State of Minnesota, by its Attorney General, Keith Ellison; and by the State of Oregon *ex rel.* Dan Rayfield, Oregon Attorney General, by and through Senior Assistant Attorney General, Justin D. Leonard, and files this *Supplement to the States' Motion for the Appointment of a Consumer Privacy Ombudsman and a Security Examiner pursuant to 11 U.S.C. Sections 105(a), 332, 363(b)(1) and Federal Rule of Bankruptcy Procedure 6004(g)*,³ and respectfully shows this Court the following:

SUPPLEMENT

Attached hereto as Supplemental Exhibit A are letters in support of the States' Motion filed at docket number 239. The following State Attorney Generals' Offices have requested that the undersigned share their letters of support with this Court:

- State of Iowa, Office of the Attorney General
- State of New Jersey, Office of the Attorney General

Dated: April 23, 2025,

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Signature Page Follows)*

Kentucky, State of Minnesota, and the State of Oregon, by and through its Attorney General Dan Rayfield, "the States."

³ Hereinafter, "Motion" or "States' Motion."

RESPECTFULLY SUBMITTED,

FOR MOVANT NAAG CLIENT STATES

/s/ ABIGAIL R. RYAN

ABIGAIL R. RYAN, BANKRUPTCY COUNSEL
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THE ATTORNEY GENERAL

OFFICE OF THE ATTORNEY GENERAL, STATE OF
CONNECTICUT

DISTRICT OF COLUMBIA, OFFICE OF THE ATTORNEY
GENERAL

STATE OF FLORIDA, OFFICE OF THE ATTORNEY
GENERAL, DEPARTMENT OF LEGAL AFFAIRS

OFFICE OF THE ILLINOIS ATTORNEY GENERAL

STATE OF LOUISIANA

STATE OF MAINE

MICHIGAN ATTORNEY GENERAL, *EX REL.* THE PEOPLE
OF THE STATE OF MICHIGAN

NEW HAMPSHIRE OFFICE OF THE ATTORNEY GENERAL,
CONSUMER PROTECTION DIVISION

NEW MEXICO DEPARTMENT OF JUSTICE

NEW YORK STATE ATTORNEY GENERAL'S OFFICE

STATE OF NORTH CAROLINA

OHIO ATTORNEY GENERAL

THE STATE OF SOUTH CAROLINA EX REL. ALAN
WILSON

STATE OF UTAH, OFFICE OF THE UTAH ATTORNEY
GENERAL

STATE OF VERMONT

COMMONWEALTH OF VIRGINIA, EX REL. JASON S.
MIYARES, ATTORNEY GENERAL

WASHINGTON ATTORNEY GENERAL NICK BROWN
OFFICE OF THE WEST VIRGINIA ATTORNEY GENERAL
STATE OF WISCONSIN

FOR MOVANT STATE OF COLORADO

/s/ ROBERT PADJEN

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**FOR MOVANT THE COMMONWEALTH OF KENTUCKY, EX
REL. RUSSELL COLEMAN, ATTORNEY GENERAL**

/s/ CHRISTOPHER D. HUNT

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**FOR MOVANT STATE OF MINNESOTA
KEITH ELLISON
ATTORNEY GENERAL OF MINNESOTA**

/s/ DALILA Z. JORDAN

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**FOR STATE OF OREGON, DAN RAYFIELD ATTORNEY
GENERAL OF OREGON**

/s/ JUSTIN D. LEONARD

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COUNSEL FOR THE STATE OF OREGON, *EX REL.*, DAN
RAYFIELD, ATTORNEY GENERAL OF OREGON

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2025, a true and correct copy of the foregoing document was served via the Court's ECF system upon all those who receive electronic notification and as required by the Case Management Procedures at docket number 131.

/s/Abigail R. Ryan

Abigail R. Ryan